

RECEIVED**MAY 24 2022**CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 875(d)

v.

18 U.S.C. § 981(a)(1)(C)

YUE VANG,
 A/K/A "YVANIME,"
 A/K/A "MICKEY-RAWR"
 A/K/A "ANIMEDORK69,"
 A/K/A "ANIMEDORKTW,"
 A/K/A "MARI.DAL16,"
 A/K/A "BOBO195,"
 A/K/A "FUSHU2,"

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

INTRODUCTION

At all times relevant to this Information:

1. The defendant, YUE VANG, resided in the State and District of Minnesota.
2. From in and around late 2015 through on or about September 30, 2020, defendant VANG used various accounts and usernames on multiple internet-based applications and social media services, including Snapchat, Facebook, Instagram, Yubo, Kik, and Skype, as well as text message, to engage minor girls in conversation. Defendant VANG knew many of the minor girls' ages because their ages were posted on their social media profiles or because the girls told defendant VANG their ages. Defendant VANG knew that many of the minor girls were under 16 years of age.



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3. Defendant VANG pretended to be various female personae in his communications with minor girls. These included "yvanime," "mickey-rawr," "animedork69," "animedorktw," "mari.dal16," "bobo195," and "fushu2," as well as names belonging to real minors.

4. Using these personae, defendant VANG employed, used, persuaded, induced, enticed, and coerced more than 500 minor girls located across the United States and elsewhere to create images and videos of themselves to send to him, including images and videos of them engaging in sexually explicit conduct. Defendant VANG did so through multiple means—including by sending suggestive images of the girls he purported to be to minor victims—to encourage minor victims to produce child pornography images to send him in exchange.

5. In order to extort additional sexually explicit images and videos from the victims, defendant VANG threatened to disseminate sexually explicit images of minor victims to the victims' friends, family members, and others. Defendant VANG used the internet to communicate these threats.

6. Minors A through D were under the age of 18 and resided outside the State and District of Minnesota.

COUNT 1
(Production of Child Pornography)

7. The allegations in paragraphs 1 through 6 of the Information are incorporated herein.

8. On or about March 14, 2016, in the State and District of Minnesota, the defendant,

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**YUE VANG,
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A/K/A "BOBO195," and
A/K/A "FUSHU2,"**

employed, used, persuaded, induced, enticed, and coerced Minor A, a 13-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely, an image file with filename "5053f120-340b-4d96-904b-28b03a2a3a11.jpg," depicting a close-up of Minor A's exposed genitals, which was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 2
(Production of Child Pornography)**

9. The allegations in paragraphs 1 through 6 of the Information are incorporated herein.

10. On or about June 23, 2016, in the State and District of Minnesota, the defendant,

YUE VANG,

employed, used, persuaded, induced, enticed, and coerced Minor B, a 16-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely, an image file with the filename "ceb736eb-46bd-4d36-9a7e-

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eea90c8737b5.jpg," depicting a close-up of Minor B's exposed genitals, which was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3
(Possession of Child Pornography)

11. The allegations in paragraphs 1 through 6 of the Information are incorporated herein.

12. On or about December 3, 2017, in the State and District of Minnesota, the defendant,

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A/K/A "BOBO195," and
A/K/A "FUSHU2,"

knowingly possessed one or more matters that contained visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means, including by cellular telephone, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, a video file with filename "91c8a0b4-498e-46d8-b90e-5556de8c494f.mp4" that is approximately

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two minutes in duration and depicts Minor C, a 16-year-old girl, posing naked and masturbating, all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT 4
(Interstate Communications with Intent To Extort)

13. The allegations in paragraphs 1 through 6 of the Information are incorporated herein.

14. On or about June 3, 2016, in the State and District of Minnesota, the defendant,

A/K/A “YVANIME,”
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“ANIMEDORK69,”
“ANIMEDORKTW,”
“MARI.DAL16,”
“BOBO195,” and
“FUSHU2,”

knowingly and with intent to extort a thing of value from Minor D, a 15-year-old girl, transmitted in interstate and foreign commerce communications containing threats to injure the person of another, specifically, threats to Minor D to distribute her sexually-explicit naked images to “everyone,” including her classmates and parents, and “ruin [her] life with these photos,” if she refused to show him her “full body” and masturbate for him via Skype video chat, all in violation of Title 18, United States Code, Section 875(d).

FORFEITURE ALLEGATIONS

Counts 1-4 of this Information are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to

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Title 18, United States Code, Sections 981(a)(1)(C) and 2253(a), and Title 28, United States Code, Section 2461(c).

If convicted of Counts 1-3 of the Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- 1) Any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
- 2) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- 3) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property subject to forfeiture includes, but is not limited to, the following property:
 - a) An Apple iPhone 8+, serial number F2MV6PA8JCLY;
 - b) A Toshiba laptop, serial number 2G055702C;
 - c) An iPhone S model A1687, Federal Communications Commission Identification BCG-E2944A;
 - d) An iPad model 1489, serial number F9FPX9R6FCMS; and
 - e) A WD Scorpio blue hard drive, serial number WXL0E495SD275.

If convicted of Count 4 of the Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 875(d).

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If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

Date: May 24, 2022

ANDREW M. LUGER
United States Attorney

/s/Chelsea A. Walcker

Miranda E. Dugi (#5140546 (NY))
Chelsea A. Walcker (#0396792 (MN))
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